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August 30, 2022

BY ECF

Honorable Jesse M. Furman
United States District Judge for
the Southern District of New York
40 Foley Square
New York, New York 10007-1312

United States v. Joshua Schulte, 17 Cr. 548 (JMF)
(Letter re: proposed pre-trial schedule)

Dear Judge Furman,

As ordered by the Court, the parties have conferred regarding the pre-trial briefing schedule for the Court's consideration. In principle, the government agrees to the briefing schedule for all but the non-CIPA motions and reserves the option to write to the Court and propose alternates dates.

CIPA Motions

2/24/2023 – Notices pursuant to CIPA Section 5
3/21/2023 – Government's motions pursuant to CIPA Section 6(a)
4/5/2023 – Defense response to Government's CIPA Section 6(a) motion
(Proceedings pursuant to CIPA Section 6(c), if any, to be addressed in light of the above)

Non-CIPA motions

4/13/2023 – all defense non-CIPA pretrial motions
5/15/2023 – Government's response
5/22/2023 – defense reply

Pretrial deadlines

3/10/2023 – Government and defense expert disclosures
6/9/2023 – Government and defense MILs/RTCs
7/7/2023 – responses to MILs/RTCs
8/11/2023 – Exchange of 3500, proposed exhibits, and Rule 26.2 materials

9/11/2023 – trial

The United States Marshal Service and the parties have agreed on a SCIF schedule of once every other week and the parties seek no relief from the Court on this matter at this time.

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The defense, depending on the Court's ruling on Mr. Schulte's pro se motions pursuant to Rule 29 and Rule 33 of the Federal Rules of Criminal Procedure, anticipates seeking immediate sentencing on the counts of which he stands convicted.

Respectfully submitted,
All Counsel

SPS/mtf